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7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,	) Case No. 2:20-cr-00228-JAM-1
	)
12 Plaintiff,	) <b>STIPULATION AND ORDER TO</b>
	) <b>CONTINUE STATUS CONFERENCE AND</b>
13 vs.	) <b>EXCLUDE TIME</b>
	)
14 RICARDO DURAN,	) Date: January 26, 2021
	) Time: 9:30 a.m.
15 Defendant.	) Judge Hon. John A. Mendez
	)
16 _____	)

17 IT IS HEREBY STIPULATED by and between McGregor W. Scott, United States  
18 Attorney, through Alexis Nelsen, Assistant United States Attorney, counsel for Plaintiff  
19 (hereinafter “the government”) and Heather Williams, Federal Defender, through Assistant  
20 Federal Defender Lexi Negin, counsel for Defendant Ricardo Duran (hereinafter “defense  
21 counsel”), **that the status conference scheduled for January 26, 2021 may be vacated and**  
22 **continued to March 16, 2021 at 9:30 a.m.**

23 The parties stipulate as follows:

- 24 1. By previous order, this matter was set for a status on January 26, 2021.
- 25 2. The parties, by stipulation, request move to continue the status conference to  
26 March 16, 2021 at 9:30 a.m.
- 27 3. Defense counsel represents that they require additional time to review discovery,  
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1 conduct further legal research; meet with her client to discuss potential resolution;  
2 and otherwise prepare for trial.

3 4. Defense counsel believes that failure to grant the requested continuance would  
4 deny them the reasonable time necessary for effective preparation, taking into  
5 account the exercise of due diligence.

6 5. The government does not object to the continuance.

7 6. Therefore, the parties stipulate that that the ends of justice served by granting the  
8 continuance outweighs the best interest of the public and the defendants in a  
9 speedy trial, and request the Court so to find.

10 7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial  
11 Act), the parties request that the time period between January 26, 2021 and March  
12 16, 2021 (inclusive) be deemed excludable pursuant to 18 U.S.C. §  
13 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance  
14 granted by the Court at defense counsel's request, based on a finding that the ends  
15 of justice served by granting the continuance outweighs the best interest of the  
16 public and the defendants in a speedy trial.

17 Respectfully submitted,

18 HEATHER E. WILLIAMS  
19 Federal Defender

20 Date: January 22, 2021

/s/ Lexi Negin  
21 LEXI NEGIN  
22 Assistant Federal Defender  
Attorneys for Defendant  
PATRICIA CISNEROS

23 Date: January 22, 2021

24 MCGREGOR W. SCOTT  
United States Attorney

25 /s/ Alexis Nelsen  
26 ALEXIS NELSEN  
27 Assistant United States Attorney  
Attorneys for Plaintiff  
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**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. Status Conference for all defendants is set for January 26, 2021 is continued to March 16, 2021, at 9:30 a.m. before Honorable John A. Mendez.

IT IS SO ORDERED.

DATED: January 22, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE